



**RIO SALADO  
COLLEGE**

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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of

Creation of a Low  
Power Radio Service

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MM Docket No. 99-25

RM-9208

RM-9242

Comments of  
Rio Salado College

Rio Salado College is one of the ten community colleges serving metropolitan Phoenix and Maricopa County as part of the Maricopa County Community College District (MCCCD). The MCCCD is the largest educational institution in Arizona, serving over 100,000 credit students each semester. As part of our service to the community, the MCCCD and Rio Salado College own and operate KJZZ-FM, KBAQ-FM, and Sun Sounds. KJZZ is an NPR news/talk/jazz station; KBAQ is the only classical music station in central Arizona; and Sun Sounds is a radio reading service reaching out to an audience of blind, visually impaired, and other print-disabled individuals. Through agreements with non-commercial, educational (NCE) stations in Tucson and Flagstaff (KUAT-FM and KNAU-FM respectively) the service is extended to print-disabled people in those communities. Our broadcast operations total 75 years of service in our communities.



I am advised that the proposal to create a class of low power FM (LPFM) stations could result in significant signal degradation for two of our three operations. At 12,500 watts, the KBAQ signal is already fragile and subject to interference. Sun Sounds, operating on the sub-carrier of KJZZ, is in a similarly vulnerable position.

Additionally, we are concerned about how a new class of stations might affect the analog-to-digital transition being studied by the Commission. The In-Band, On-Channel (IBOC) proposals under consideration will likely use existing sidebands to accommodate digital transmission. Because these proposals are based on current interference standards, any change in those standards could have a serious effect on Sun Sounds and other reading services. It is conceivable that the very viability of our service could be brought into question.

It is my understanding that the creation of an LPFM class of stations would offer the potential for increased minority and/or female ownership of such stations. While such a goal is laudable, the achievement of the goal at the potential expense of a currently served disabled constituency seems both improvident and inconsistent with existing policy.

In 1983, when determining that public radio stations could use their subcarriers for remunerative purposes, the Commission stated that stations taking advantage of the new policy must "ensure that neither existing nor potential radio reading services for the blind are diminished . . . by the pursuit of commercial subcarrier undertakings." *Amendment of Section 73.593 of the Commissions Rules, 54 RR 2d 25, 36 (1983); see also* 47 C.F.R. §73.593. The LPFM proposal, through reduced interference standards, could easily result in diminished service as an unintended consequence.

An additional conflict seems to exist with Section 255 of the Telecommunications Act of 1996. The intent of this section was to ensure the availability of telecommunications equipment and services to the disabled. *See* 47 U.S.C. §255.

The absence of definitive information on potential interference to existing broadcast operations is striking. Given a choice between proceeding without such knowledge, or waiting until such time as it is available, the choice seems clear. Rio Salado College and the Maricopa County Community College District request that any action on the LPFM proposal be deferred until such time as the technical and policy questions can be addressed in a factual and comprehensive manner.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Linda Thor", with a large, sweeping flourish at the end.

Dr. Linda Thor  
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